IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND GREENBELT DIVISION

ANITA LANN, et al.,

Plaintiffs,

Case No. 14-CV-2237 (PJM)

v.

TRINITY HEALTH
CORPORATION, et al.,

Defendants.

*

PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT AGREEMENT AND CERTIFICATION OF SETTLEMENT CLASS

Plaintiffs Anita Lann, Jean Atcherson, Albert R. Chavies and Thomas Holland, by and through their attorneys, respectfully move the Court for an Order: (1) granting final approval of the Class Action Settlement Agreement ("Settlement" or "Settlement Agreement") described herein and preliminarily approved by the Court on February 3, 2017 (entered February 6, 2017) (Dkt. # 101); and (2) granting final certification of the Class pursuant to Federal Rules of Civil Procedure 23(b)(1) and/or 23(b)(2). Defendants do not oppose the relief sought herein. For the reasons fully set forth in the accompanying Plaintiffs' Memorandum in Support of Unopposed Motion for Final Approval of Settlement Agreement and Certification of Settlement Class, Plaintiffs respectfully request that the Court GRANT the Motion and enter the Proposed Order, filed herewith, concluding this novel case concerning ERISA's "Church Plan" exemption.

¹ Plaintiffs file the instant Motion contemporaneously with their Motion for Awards of Attorneys' Fees and Expenses, and Incentive Fees to the Named Plaintiffs.

Dated: April 17, 2017 Respectfully submitted,

COHEN MILSTEIN SELLERS & TOLL PLLC

/s/ Michelle C. Yau

Michelle C. Yau (admitted *pro hac vice*) Karen L. Handorf (admitted *pro hac vice*) Mary J. Bortscheller (admitted *pro hac vice*) 1100 New York Avenue, N.W. Suite 500

Washington, D.C. 20005 Tel: (202) 408-4600

Fax: (202) 408-4699

Email: myau@cohenmilstein.com khandorf@cohenmilstein.com mbortscheller@cohenmilstein.com

KELLER ROHRBACK L.L.P.

Lynn Lincoln Sarko Havila Unrein Matthew Gerend 1201 Third Avenue, Suite 3200 Seattle, WA 98101

Tel: (206) 623-1900 / Fax: (206) 623-3384 Email: lsarko@kellerrohrback.com hunrein@kellerrohrback.com

mgerend@kellerrohrback.com

KELLER ROHRBACK L.L.P.

Ron Kilgard Laurie B. Ashton 3101 North Central Avenue, Suite 1400 Phoenix, AZ 85012

Tel: (602) 248-0088 / Fax: (602) 248- 2822

Email: rkilgard@kellerrohrback.com

lashton@kellerrohrback.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on April 17, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/ Michelle C. Yau Michelle C. Yau